

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

| | | |
|-------------------------------|---|---------------------|
| DANIEL KANG, |) | CIVIL ACTION NO. |
| |) | |
| Plaintiff, |) | 4:21-CV-111-WTM-CLR |
| |) | |
| vs. |) | |
| |) | |
| THE MAYOR AND ALDERMEN OF THE |) | |
| CITY OF SAVANNAH and ROY W. |) | |
| MINTER, JR., Chief of Police |) | |
| for the City of Savannah, |) | |
| Georgia, In His Individual |) | |
| and Official Capacities, |) | |
| |) | |
| Defendants. |) | |

VIDEOCONFERENCE DEPOSITION OF
JEFFREY GRANT

August 29, 2022

2:59 p.m.

218 West State Street
Savannah, Georgia

Thomas J. Dorsey, RPR, CCR-2781

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33 Also Present:

34 Daniel Kang
35 Jamar Bacon

36 - - -

37 Gilbert & Jones

| <div>3</div> <div>EXHIBIT 26</div> <div>5</div> <div>1 INDEX TO EXAMINATIONS</div> <div>2 Examination Page</div> <div>3 By Mr. Schiavone 4</div> <div>4 By Mr. Kachmar 23</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div> <div>Gilbert & Jones</div> | <div>1 Q. Can you tell me what -- what does that</div> <div>2 entail? What are your duties?</div> <div>3 A. I oversee the compensation. I oversee</div> <div>4 benefits and retirement. I oversee learning and</div> <div>5 organizational development. I oversee employee</div> <div>6 relations as well as I oversee projects related to HR</div> <div>7 management.</div> <div>8 Q. And what's the -- Savannah Police</div> <div>9 Department, how -- how is that structured in relation</div> <div>10 to the City and the department of human resources?</div> <div>11 Are they just an appendage of the City?</div> <div>12 A. Well, we're broken up into seven service</div> <div>13 centers. So we have police is one of our service</div> <div>14 centers. Fire's one of our service centers,</div> <div>15 community services, infrastructure and development,</div> <div>16 municipal operations as well as governance and</div> <div>17 strategic services. So police department is one of</div> <div>18 our service centers.</div> <div>19 Q. And are each one of those departments, are</div> <div>20 they controlled by the policies of the City of</div> <div>21 Savannah?</div> <div>22 A. They are, yes.</div> <div>23 Q. All right. And that includes the</div> <div>24 progressive discipline policy at the City?</div> <div>25 A. That is correct, yes.</div> <div>Gilbert & Jones</div> |
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| <div>4</div> <div>1 (Reporter disclosure made pursuant to</div> <div>2 Article 10.B. of the Rules and Regulations of the</div> <div>3 Board of Court Reporting of the Judicial Council of</div> <div>4 Georgia.)</div> <div>5 JEFFREY GRANT,</div> <div>6 having first been duly sworn, was examined and</div> <div>7 testified as follows:</div> <div>8 MR. SCHIAVONE: Okay. This is the</div> <div>9 deposition of Jeff Grant taken pursuant to the</div> <div>10 Federal Rules of Civil Procedure. All</div> <div>11 objections are reserved except to the form of</div> <div>12 the question.</div> <div>13 MR. O'CONNOR: That's agreeable. And</div> <div>14 Mr. Grant will reserve reading and signing.</div> <div>15 MR. SCHIAVONE: All right. Great.</div> <div>16 MR. KACHMAR: Agreed for Chief Minter too.</div> <div>17 MR. SCHIAVONE: Great. Thank you.</div> <div>18 EXAMINATION</div> <div>19 BY MR. SCHIAVONE:</div> <div>20 Q. Would you state your name, please, for the</div> <div>21 record?</div> <div>22 A. Jeffrey Grant.</div> <div>23 Q. And how are you employed, Mr. Grant?</div> <div>24 A. I'm the HR director at the City of</div> <div>25 Savannah.</div> <div>Gilbert & Jones</div> | <div>6</div> <div>1 Q. And are you aware of what I mean by that?</div> <div>2 A. Yes. I'm aware of that, yes.</div> <div>3 Q. All right. And that's a number of stages</div> <div>4 that should be considered before an employee is</div> <div>5 terminated?</div> <div>6 A. That's correct, yes.</div> <div>7 Q. All right. Now, at some point you're</div> <div>8 aware of this case of Dan Kang and Michael Arango?</div> <div>9 A. I'm familiar with them, yes.</div> <div>10 Q. All right. And at some point about 75</div> <div>11 officers filed what I'll call a group human resource</div> <div>12 complaint about Chief Minter. Were you aware of</div> <div>13 that?</div> <div>14 A. Yes.</div> <div>15 Q. And when that was filed, what's the</div> <div>16 procedure in handling that? What happens after --</div> <div>17 does that go to you directly first?</div> <div>18 A. The way it works is, yes, it comes to</div> <div>19 human resources. At the time we had a -- it's a</div> <div>20 conflict resolution program, and all of those</div> <div>21 officers or at least majority of them filed to our</div> <div>22 office, yes.</div> <div>23 Q. All right. There was a general complaint</div> <div>24 filed and then individual complaints?</div> <div>25 A. That is correct.</div> <div>Gilbert & Jones</div> |

1 Q. All right. That was a significant number,
2 wasn't it, a significant number of officers
3 complaining about Chief Minter's conduct?

4 MR. O'CONNOR: Object to form. You can
5 answer subject to the objection. If you can
6 answer, go ahead.

7 THE WITNESS: It's -- it's more than
8 we've -- we've had before, yes.

9 Q. (By Mr. Schiavone) That was about 77
10 officers?

11 A. That was probably around 56, 57 who
12 actually submitted, yes.

13 Q. How long have you been with -- with the
14 City?

15 A. I've been with the City for four years.

16 Q. All right. And during -- so you would
17 have been with the City what, two years when back in
18 2020? When was this? This was in 2020?

19 A. That's correct, yes.

20 Q. All right. And just in those two-year
21 period then, had you ever seen anything like this
22 before in your office?

23 A. I have not.

24 Q. All right. Was this considered by you a
25 big deal at that point?

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1 A. I mean, it was -- I mean, it was -- it was
2 a larger-than-usual submission, yes.

3 Q. All right. Well, so what would be the
4 procedure once you received it? What do you do when
5 you received it?

6 A. In this case we actually contracted out
7 with an attorney to conduct the inquiry. We
8 submitted all of the submissions to that attorney for
9 review, yeah.

10 Q. When you say we, who's we?

11 A. The City of Savannah, the office of human
12 resources, yes.

13 Q. All right.

14 A. Yeah.

15 Q. All right. What other individual would
16 have been involved with that decision?

17 A. Oh, the city manager, of course. Yeah,
18 obviously the city manager, you know, weighed into
19 that and as well as the city attorney's office, yes.

20 Q. All right. And you worked under the city
21 manager?

22 A. Yes, sir.

23 Q. Now, do you answer to him directly or to
24 someone else?

25 A. I do, directly to the city manager.

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1 Q. All right. So when you received these
2 complaints by these officers, did you contact
3 Mr. Monahan?

4 A. At some point. It's been a while, but,
5 yes, I would have contacted him. That's correct,
6 yes.

7 Q. All right. And who made the decision to
8 hire outside counsel?

9 A. That was Mr. Monahan, yes.

10 Q. And would the mayor and the city council
11 have to okay this?

12 A. No.

13 Q. All right. Where would the funds come to
14 pay that lawyer?

15 A. I'm -- I'm not sure where out of the
16 budget it came from, yeah.

17 Q. Well, I mean, is that -- does the city
18 manager have the authority to make those kinds of
19 decisions when money's to be spent? He doesn't have
20 to go to somebody, to the city council or someone
21 like that?

22 A. It's under his purview.

23 Q. His purview?

24 A. Yeah.

25 Q. All right. And was the request for her to

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1 do a complete investigation with recommendations?

2 A. That's correct. It was to review the
3 inquiries and -- and then provide a summary of those
4 inquiries and -- and to look into it as well too,
5 yes.

6 Q. And did she find -- find merit to the
7 complaints?

8 A. She provided a summary of findings and
9 more of a -- more so themes of that kind of resinated
10 from the complaints and -- and that was -- that was a
11 part of her role.

12 Q. Well, who made the final decision and what
13 action was taken against the chief, if any?

14 A. The city manager made the final decision.

15 Q. All right. Do you know what that decision
16 was?

17 A. The city manager made a list of -- he
18 identified a list of findings that he discussed with
19 the chief and talked with the chief in regards and
20 then also communicated it to those who made the
21 complaint.

22 Q. So no action was taken in reference to his
23 job? What, just do better? Don't use retribution
24 against other officers?

25 MR. O'CONNOR: Object to the form.

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11 EXHIBIT 26

1 MR. KACHMAR: Object to the form.
 2 MR. O'CONNOR: That's three questions,
 3 Mike.
 4 MR. SCHIAVONE: Right, right.
 5 Q. (By Mr. Schiavone) I mean, there were
 6 allegations of retribution against officers. Didn't
 7 that concern y'all?
 8 A. The city manager -- that's -- that's his
 9 purview.
 10 Q. Well, when officers, when he -- when the
 11 chief after that took action against officers who
 12 there were allegations of violating policy, if some
 13 of those were officers that filed these complaints,
 14 didn't y'all believe that it was a conflict for the
 15 chief to be the one to make those decisions?
 16 MR. KACHMAR: Object to the form.
 17 Q. (By Mr. Schiavone) You'd already had
 18 allegations of retribution against officers. Now you
 19 have officers who there's allegations against that
 20 sign the group complaint and individual complaint.
 21 Arango and Kang were two of them.
 22 When their cases came up on appeal, wasn't
 23 there a conflict of interest for the chief to make
 24 the final decision?
 25 MR. KACHMAR: Object to the form.

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1 Q. (By Mr. Schiavone) Why didn't you hire an
 2 attorney or someone separate to make those
 3 determinations because of the allegations of
 4 retribution?
 5 MR. KACHMAR: Object to the form.
 6 MR. O'CONNOR: The same objection.
 7 MR. SCHIAVONE: Yeah.
 8 Q. (By Mr. Schiavone) But why didn't -- why
 9 didn't you recommend that to Mr. -- to the city
 10 manager that this wouldn't be fair for him to make
 11 these determinations on these officers in light of
 12 the allegations of retribution?
 13 A. I -- in my role I followed the policy
 14 according to the City, and that's the -- there's a
 15 particular process that we follow for all employees.
 16 Q. So there was no discussion concerning
 17 whether or not the chief could be fair to these
 18 officers in making recommendations which in this case
 19 was termination? Wasn't there some concern about the
 20 conflict of interest at that point?
 21 MR. KACHMAR: Object to the form.
 22 MR. O'CONNOR: The same objection.
 23 THE WITNESS: Yeah, once again, we -- we
 24 followed the process at the City of Savannah,
 25 yeah.

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1 Q. (By Mr. Schiavone) Well, is the process
 2 not to consider that?
 3 A. Now, could you clarify what you're -- what
 4 you're really asking?
 5 Q. Well, you told me you follow policy.
 6 A. Yeah.
 7 Q. I mean, do you have any obligation to make
 8 sure the process is fair?
 9 A. Through -- through the processes at the
 10 City that's -- that's -- that's what we do with the
 11 office of human resources, is we follow that.
 12 Q. Follow -- yeah, that it should be fair.
 13 Does conflict of interest ever enter into
 14 that policy in your determinations?
 15 A. I'm not aware of any conflict of interest,
 16 so...
 17 Q. Well, if you had officers that said that
 18 the chief was acting out of retribution against them
 19 in promotions and in many other ways and then those
 20 officers get accused of something, of violating
 21 policy, you don't think it ever occur or didn't, it
 22 wouldn't occur to you that there might be a conflict
 23 of interest at that point?
 24 MR. KACHMAR: Object to the form.
 25 THE WITNESS: Yeah, I'm not -- I'm not

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1 aware of any conflict of interest, so sorry.
 2 Q. (By Mr. Schiavone) All right. Does the
 3 manager -- does the city manager or do you, do y'all
 4 have the power to have appointed somebody impartial
 5 to make determinations on these officers when there
 6 was an allegation of violating policy?
 7 MR. KACHMAR: Object to the form.
 8 THE WITNESS: And you're referencing to --
 9 could you clarify the question?
 10 Q. (By Mr. Schiavone) Kang, Kang and Arango.
 11 A. I'm -- I'm -- I'm not sure what you're
 12 really asking of me, yeah.
 13 Q. I'm asking --
 14 A. Yeah.
 15 Q. -- when you see that you have 70-some
 16 officers making numerous allegations of retribution,
 17 of not following procedures, not following policy,
 18 and then two of those officers in that petition are
 19 accused of violating policy and they are brought
 20 before you on appeal because the chief doesn't follow
 21 the recommendation of his subordinate officers, none
 22 of which recommended termination, didn't it occur to
 23 you at that time that the chief couldn't be impartial
 24 to these two officers?
 25 MR. KACHMAR: Object to the form.

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| 15 EXHIBIT 26 | 17 |
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| <p>1 MR. O'CONNOR: You can only answer what</p> <p>2 you know, so if you know --</p> <p>3 THE WITNESS: Yeah.</p> <p>4 MR. O'CONNOR: -- then answer his</p> <p>5 question.</p> <p>6 Q. (By Mr. Schiavone) So it never occurred?</p> <p>7 That never occurred to you?</p> <p>8 A. In our process at the City of Savannah, I</p> <p>9 mean, we -- we have a -- you know, an entire appeal</p> <p>10 process. All departments go through it and -- and it</p> <p>11 goes through each of the stages all the way up to the</p> <p>12 city manager, yeah.</p> <p>13 Q. All right. When -- when Kang and Arango's</p> <p>14 cases came to you, how would they have come to you</p> <p>15 after the chief didn't follow the recommendations of</p> <p>16 his subordinate officers and order termination? How</p> <p>17 would those cases come to you?</p> <p>18 A. Typically what would happen is the chief</p> <p>19 would have a recommendation or his determination</p> <p>20 which direction he would be going and he'd provide</p> <p>21 the -- you know, any documents related to that to</p> <p>22 review and ensure that, you know, if there's anything</p> <p>23 out of City policy.</p> <p>24 Q. All right. Well, let me -- let me go into</p> <p>25 that then on these documents.</p> <p style="text-align: center;">Gilbert & Jones</p> | <p>1 would be governed by the chief of police so they</p> <p>2 have -- they have a process in place in which they</p> <p>3 administer that.</p> <p>4 Q. Were you given these two policies and told</p> <p>5 that he didn't follow the existing policy, Exhibit 1?</p> <p>6 That in fact he followed the draft policy in</p> <p>7 Exhibit 2? Were you given those and told that on the</p> <p>8 appeal of Kang and Arango?</p> <p>9 A. I was not.</p> <p>10 Q. All right. So you weren't given that</p> <p>11 information and don't -- don't employees of the City</p> <p>12 of Savannah have a right to rely on the existing</p> <p>13 policies in force at the time of their case?</p> <p>14 A. Yes. I mean, any policies that are</p> <p>15 actively being used, correct.</p> <p>16 Q. All right. And the process lays out</p> <p>17 basically a due process process, doesn't it, to give</p> <p>18 the officers due process?</p> <p>19 A. Yes. The City of Savannah processes a due</p> <p>20 process, yes.</p> <p>21 Q. All right. And doesn't everyone have to</p> <p>22 follow the existing policy that works for the City of</p> <p>23 Savannah?</p> <p>24 MR. KACHMAR: Object to the form.</p> <p>25 THE WITNESS: The policies that we have in</p> <p style="text-align: center;">Gilbert & Jones</p> |
| 16 | 18 |
| <p>1 I'd ask them to hand you Exhibit 1 and</p> <p>2 Exhibit 2.</p> <p>3 MR. O'CONNOR: There's 1. There's 2.</p> <p>4 Q. (By Mr. Schiavone) Take a look at that.</p> <p>5 Exhibit 1 was the existing policy of the Savannah</p> <p>6 Police Department. Exhibit 2 is a draft policy that</p> <p>7 had never been implemented.</p> <p>8 Would the chief be allowed to create his</p> <p>9 own policy and follow that rather than the policies</p> <p>10 implemented? Does he have a right to create his own</p> <p>11 policies?</p> <p>12 A. Well, we have policies that -- yes. There</p> <p>13 are policies within the police department in which</p> <p>14 are established by the chief of police, yeah.</p> <p>15 Q. Right, but what if -- what if it's a</p> <p>16 policy that is just a draft. It's never been</p> <p>17 implemented and he proceeds on the draft and not on</p> <p>18 the existing policy. The chief's not allowed to do</p> <p>19 that, is he?</p> <p>20 MR. O'CONNOR: Object to the form.</p> <p>21 THE WITNESS: Yeah.</p> <p>22 MR. O'CONNOR: Go ahead if you can.</p> <p>23 Q. (By Mr. Schiavone) Is he allowed to do</p> <p>24 that?</p> <p>25 A. These are departmental policies. These</p> <p style="text-align: center;">Gilbert & Jones</p> | <p>1 place, yes.</p> <p>2 Q. (By Mr. Schiavone) Yeah. So does</p> <p>3 every -- does every employee have to follow that</p> <p>4 including you and the city manager?</p> <p>5 MR. KACHMAR: Object to the form.</p> <p>6 THE WITNESS: Yes.</p> <p>7 Q. (By Mr. Schiavone) All right. Now, were</p> <p>8 you given -- do you know what the Douglas Factors</p> <p>9 are?</p> <p>10 A. I'm familiar with them.</p> <p>11 Q. All right. Were you ever given the</p> <p>12 findings in writing of the Douglas Factors found in</p> <p>13 Kang or Arango's case?</p> <p>14 A. I do not -- I do not remember, no. I</p> <p>15 can't recall, no.</p> <p>16 Q. All right. All right. If that was</p> <p>17 required by policy, wouldn't you have required that</p> <p>18 that information be given to y'all in the appeal?</p> <p>19 A. Once again, these are -- these are</p> <p>20 departmental policies, so we -- in my role it would</p> <p>21 be more so the overarching City of Savannah policies.</p> <p>22 These are departmental policies that are -- that are</p> <p>23 governed by the police department, yeah.</p> <p>24 Q. All right. But the chief is required to</p> <p>25 do the progressive discipline policy of the City,</p> <p style="text-align: center;">Gilbert & Jones</p> |

1 isn't he?

2 MR. KACHMAR: Object to the form.

3 THE WITNESS: Correct.

4 Q. (By Mr. Schiavone) And did you receive
5 the written document showing where he followed that
6 policy on Kang and Arango?

7 A. I -- I can't recall on that, yeah.

8 Q. All right. Have you ever seen that
9 document?

10 A. And which document are you speaking of?

11 Q. The progressive determination that the
12 chief and the Savannah Police followed in making a
13 determination as to Kang and Arango as to punishment.

14 A. I mean, I can't -- I can't recall. I
15 mean, I know there's two -- I know they were big
16 files, so, I mean, yes. I mean, I think that I
17 received files on what his determinations were going
18 to be, but as it pertains to like a specific
19 document, no, I -- I don't recall that, no.

20 Q. Well, was part of your duties to meet with
21 Arango and Kang in their appeal?

22 A. Not me. I facilitated the process. That
23 would be, once it gets to the city manager, yes. The
24 city manager would be the person they meet with.

25 Q. Would be the person?

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1 A. Yes, sir.

2 Q. But you'd be the one that would supply him
3 with the documents to review for the appeal?

4 A. We would, yes. We would provide that to
5 the city manager, yes, from the police department.

6 Q. All right.

7 A. So the police department would provide.

8 Q. From the police department?

9 A. Yes, that's correct.

10 Q. And do you have a package somewhere that
11 would show everything that was supplied to you that
12 you supplied to the city manager, Mr. Monahan?

13 A. I mean, it could be -- it could be in the
14 e-mail. I mean, there -- it could have been sent
15 hard copy. I would not necessarily have a copy of
16 that, not the full packet.

17 Q. Well --

18 A. Yeah. That would be at the police
19 department.

20 Q. But wouldn't there be a file open once the
21 appeal was -- was filed and all the documents sent to
22 your office? Wouldn't there be a file open and all
23 of this be put in that file for Kang's appeal and for
24 Arango's appeal?

25 A. There -- there -- there would be. There

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1 would be a file that would have the final

2 determination by the city manager, yes.

3 Q. Wouldn't it also contain all the documents
4 that were considered and sent to you by the police
5 department?

6 A. We would have that electronically, yes.

7 Q. All right. So -- so we can get access to
8 that somewhere?

9 A. We could. I'd have to ask for IT for
10 that, but, yes.

11 MR. SCHIAVONE: All right. Now, give me
12 one second.

13 (Pause.)

14 Q. (By Mr. Schiavone) Would you have
15 requested of the Savannah Police Department to give
16 you copies of similar other conduct and the
17 punishments that were meted out in relation to those
18 cases to compare to the Kang and Arango punishment
19 pursuant to the progressive requirements of the City
20 of Savannah on punishment?

21 A. No, I don't -- I don't remember that, no.

22 Q. So, to your knowledge, no one requested
23 that, either you or the city manager?

24 A. I can -- I cannot remember that, yeah.

25 No.

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1 MR. SCHIAVONE: One second.

2 (Pause.)

3 Q. (By Mr. Schiavone) Were you involved with
4 any of the press conferences held by the mayor and
5 the chief, Minter, and the DA at the time, Meg Heap,
6 in reference to Kang and Arango's cases?

7 A. I was not.

8 MR. SCHIAVONE: All right. If I could --
9 could we just take a break real quick? I may be
10 done.

11 MR. O'CONNOR: Sure.

12 (Recess taken from 3:21 p.m. to 3:30 p.m.)

13 Q. (By Mr. Schiavone) Mr. Grant --

14 A. Yes.


15 Q. -- can you tell me, when you received this
16 appeal and all the paperwork that you've indicated
17 you had received for the appeal, what conversation
18 did you have with the city manager when you turned
19 this over to him? Anything? Can you tell me?

20 A. No. I didn't have any conversations, not
21 that I can recall, with him, yeah.

22 MR. SCHIAVONE: All right. All right.
23 That's all the questions I've got, Pat.

24 MR. O'CONNOR: The City has no questions
25 for Mr. Grant.

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| <p style="text-align: right;">23 EXHIBIT 26</p> <p>1 MR. KACHMAR: I have a couple questions,</p> <p>2 Mr. Grant.</p> <p>3 THE WITNESS: Yes.</p> <p>4 MR. KACHMAR: I represent Chief Minter.</p> <p>5 EXAMINATION</p> <p>6 BY MR. KACHMAR:</p> <p>7 Q. Under the City's progressive discipline</p> <p>8 policy, does the City reserve the right to skip one</p> <p>9 or more steps?</p> <p>10 A. They do.</p> <p>11 Q. So --</p> <p>12 A. They do.</p> <p>13 Q. Go ahead. Sorry. Finish your answer.</p> <p>14 A. I was going to say, depending on the</p> <p>15 severity, yes.</p> <p>16 Q. Okay. When you received a copy of the --</p> <p>17 the group complaint as it was referred to earlier and</p> <p>18 then also Mr. Kang's individual complaint, did you at</p> <p>19 any time prior to the decision to terminate</p> <p>20 Mr. Kang's employment, did you give a copy of either</p> <p>21 signed complaint to Chief Minter?</p> <p>22 A. No.</p> <p>23 Q. Are you aware of anyone that gave a copy</p> <p>24 of either of the signed complaints to Chief Minter?</p> <p>25 A. No.</p> <p style="text-align: center;">Gilbert & Jones</p> | <p style="text-align: right;">25</p> <p>1 THE WITNESS: All right. Thanks.</p> <p>2 (Deposition concluded at 3:32 p.m.)</p> <p>3 (Pursuant to Rule 30(e) of the Federal</p> <p>4 Rules of Civil Procedure and/or O.C.G.A. 9-11-30(e),</p> <p>5 signature of the witness has been reserved.)</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: center;">Gilbert & Jones</p> |
| <p style="text-align: right;">24</p> <p>1 Q. At some point prior to the termination,</p> <p>2 did you ever ask Chief Minter about any of the</p> <p>3 allegations in either Mr. Kang's individual complaint</p> <p>4 or the group complaint?</p> <p>5 A. Could you repeat that again one more time?</p> <p>6 Q. Yeah.</p> <p>7 At any time prior to the decision to</p> <p>8 terminate Mr. Kang's employment, did you ask Chief</p> <p>9 Minter --</p> <p>10 A. Oh, no.</p> <p>11 Q. -- about any of the allegations in</p> <p>12 Mr. Kang's individual complaint or in the group</p> <p>13 complaint?</p> <p>14 A. No, no.</p> <p>15 MR. KACHMAR: No further questions.</p> <p>16 MR. SCHIAVONE: All right. Thank y'all.</p> <p>17 MR. O'CONNOR: Thank you, Mike. We'll see</p> <p>18 you later. Take care.</p> <p>19 MR. SCHIAVONE: All right. All right,</p> <p>20 Pat.</p> <p>21 THE WITNESS: All right. Thanks. Good</p> <p>22 seeing you again, Mike.</p> <p>23 MR. SCHIAVONE: Thank you.</p> <p>24 THE WITNESS: Good seeing you again.</p> <p>25 MR. SCHIAVONE: Thank you, Mr. Grant.</p> <p style="text-align: center;">Gilbert & Jones</p> | <p style="text-align: right;">26</p> <p>1 CERTIFICATE OF COURT REPORTER</p> <p>2</p> <p>3 STATE OF GEORGIA:</p> <p>4 COUNTY OF EFFINGHAM:</p> <p>5</p> <p>6 I hereby certify that the foregoing</p> <p>7 transcript was reported as stated in the caption and</p> <p>8 the questions and answers thereto were reduced to</p> <p>9 writing by me; that the foregoing 25 pages represent</p> <p>10 a true, correct, and complete transcript of the</p> <p>11 evidence given on August 29, 2022, by the witness,</p> <p>12 JEFFREY GRANT, who was first duly sworn by me.</p> <p>13 I certify that I am not disqualified</p> <p>14 for a relationship of interest under</p> <p>15 O.C.G.A. 9-11-28(c); I am a Georgia Certified Court</p> <p>16 Reporter here as an employee of Gilbert & Jones, Inc.</p> <p>17 who was contacted by Savage & Turner to provide court</p> <p>18 reporting services for the proceedings; I will not be</p> <p>19 taking these proceedings under any contract that is</p> <p>20 prohibited by O.C.G.A. 15-14-37(a) and (b) or</p> <p>21 Article 7.C. of the Rules and Regulations of the</p> <p>22 Board; and by the attached disclosure form I confirm</p> <p>23 that neither I nor Gilbert & Jones, Inc. are a party</p> <p>24 to a contract prohibited by O.C.G.A. 15-14-37(a) and</p> <p>25 (b) or Article 7.C. of the Rules and Regulations of</p> <p>the Board.</p> <p style="text-align: center;">This 31st day of August 2022.</p> <p style="text-align: center;">  THOMAS J. DORSEY, CERTIFIED COURT REPORTER, 2781 </p> <p style="text-align: center;">Gilbert & Jones</p> |

DISCLOSURE OF NO CONTRACT

I, Debbie Gilbert, do hereby disclose pursuant to Article 10.B of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia that Gilbert & Jones, Inc. was contacted by Savage & Turner to provide court reporting services for these proceedings and there is no contract that is prohibited by O.C.G.A. 15-14-37(a) and (b) or Article 7.C. of the Rules and Regulations of the Board for the taking of these proceedings.

There is no contract to provide reporting services between Gilbert & Jones, Inc. or any person with whom Gilbert & Jones, Inc. has a principal and agency relationship nor any attorney at law in this action, party to this action, party having a financial interest in this action, or agent for an attorney at law in this action, party to this action, or party having a financial interest in this action. Any and all financial arrangements beyond our usual and customary rates have been disclosed and offered to all parties.

This 31st day of August 2022.

Debbie Gilbert

Debbie Gilbert, FIRM
REPRESENTATIVE
Gilbert & Jones, Inc.

Gilbert & Jones

DEPOSITION OF: JEFFREY GRANT /TJD

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If supplemental or additional pages are necessary, please furnish same in typewriting annexed to this deposition.

JEFFREY GRANT

Sworn to and subscribed before me,
This the ____ day of ____, 20__.

Notary Public
My commission expires: _____

Please forward corrections to:

Gilbert & Jones, Inc.
7505 Waters Avenue, Suite F3
Savannah, GA 31406
(912) 355-1061

Gilbert & Jones

DEPOSITION OF: JEFFREY GRANT /TJD

I do hereby certify that I have read all questions propounded to me and all answers given by me on August 29, 2022, taken before Thomas J. Dorsey, and that:

- ____ 1) There are no changes noted.
____ 2) The following changes are noted:

Pursuant to Rule 30(e) of the Federal Rules of Civil Procedure and/or the Official Code of Georgia Annotated 9-11-30(e), both of which read in part: Any changes in form or substance which you desire to make shall be entered upon the deposition...with a statement of the reasons given...for making them. Accordingly, to assist you in effecting corrections, please use the form below:

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